
From: Friedberg, Anna
Sent: Monday, September 09, 2013 9:01 AM
To: Savino, Kimberly (Law)
Cc: Raad, Amanda; Busalacchi, Stephanie; Cobb, Emily A.; Grygiel, Heidi (Law); Snyder, Lynda (Law); Lim, Daniel (Law); Ortiz, Julie (Law); Larkin, Arthur (Law); Nguyen, Diep (Law)
Subject: Nunez: E-Discovery Follow-Up

All,

Thank you for taking the time to speak with us on Friday. As we discussed on the call, the initial production of the two agreed upon search terms for the group A custodians will be made by September 13th. We understand you have also already collected the emails for all group B custodians and identified the documents that have hit on the two agreed upon search terms.

As we have previously discussed, the sampling of Plaintiffs proposed search terms, and identification of other relevant search terms, must occur simultaneously with production of relevant documents. The sampling process of the terms Plaintiffs proposed on June 27, 2013 is taking too long. We are concerned, based on the representations made on Friday's call, that the resources the City is expending on this effort are insufficient to allow us to move forward in a timely fashion.

As we discussed, we would like to complete the production of all relevant documents for group A custodians before we move on to the production for the next set of custodians. In order to accomplish that, we must receive the results of the sampling and suggested modifications so we can agree upon additional search terms. In particular, this list must include the results of the sampling and any proposed modifications especially for the terms that have the highest hitting results. The prioritization of this effort should not prejudice your efforts to move forward with collection for the other agreed upon custodians and other efforts to allow timely production.

We continue to request a list of shared drives that was originally requested on June 27, 2013. Please let us know when we can expect this list.

We look forward to speaking with you on Thursday, September 12th at 11.

Thanks,
Anna

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